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U.S. COURTS

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 CAMERON S. BURKE

CLERK, IDAHO

IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE DISTRICT OF IDAHO

In Re:	)	Case No. 99-41532
	)	(Chapter 12)
LEO "BRUCE" ROBBINS and	)	
HEIDI ROBBINS,	)	<u>MOTION TO MODIFY CONFIRMED</u>
	)	<u>CHAPTER 12 PLAN AND ORDER</u>
Debtors.	)	<u>CONFIRMING THE PLAN</u>

COME NOW the debtors, by and through their attorney, Brent T. Robinson of the firm LING & ROBINSON, and move the Court for an order modifying further debtors' confirmed Chapter 12 Plan and Order Confirming Chapter 12 Plan to change the amount that is paid to KeyBank on a monthly basis. More specifically, debtors move the Court to modify its Plan deleting from the Stipulation for Treatment of Claim that has been incorporated into the confirmed Plan the following, to-wit:

"(H) That fifty percent (50%) of any proceeds received from all subsequent sales of cattle which exceed debtors' monthly budget projection of \$18,150 shall be paid to KeyBank, and shall be applied to the indebtedness due and owing to KeyBank.

"(I) In the event debtors receive more than \$34,000 from the current sale of livestock, any sum received in excess

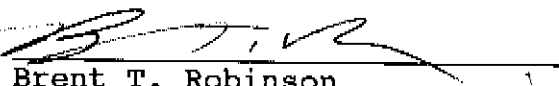
Motion to Modify Confirmed  
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1 of the \$34,000 cash collateral authorized to be used by  
2 debtors shall be paid to KeyBank and applied to the  
3 indebtedness owed by the debtors."

4 to provide that debtors shall pay, in addition to what is presently  
5 paid through the Trustee, \$2,000 per month, until the amount owed  
6 to KeyBank is satisfied.

7 That the basis for this motion to modify is that debtors  
8 can no longer continue to make those payments because the nature  
9 of the cost of raising the calves in an unanticipated way has been  
10 changed. The calf prices went from \$20 per calf to \$100 per calf.  
11 That has caused the calf price to go from \$1,600 in the budget to  
12 \$7,500. Furthermore, because there are more calves involved, the  
13 costs of labor, feed, medicine, fuel, utilities, supplies, and  
14 repairs have increased, resulting in the debtors' inability to pay  
15 the other expenses that need to be paid to continue their operation.  
16 Furthermore, with this motion being granted, KeyBank will still be  
17 paid in full prior to December 31, 2004. It is in the best  
18 interests of the estate that this motion be granted so that the  
19 other expenses that need to be paid by the debtors can, in fact,  
20 continue to be made and the operation can continue.

21 LING & ROBINSON

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23 Brent T. Robinson  
24 Attorney for Debtors  
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